

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SONOS, INC.,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

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Case No. 6:20-cv-00881-ADA

**DECLARATION OF LINDSAY COOPER IN SUPPORT OF  
GOOGLE LLC'S RULE 12(B)(3) MOTION TO STAY OR DISMISS  
PURSUANT TO THE FIRST-TO-FILE RULE**

I, Lindsay Cooper, declare and state as follows:

1. I am an associate at Quinn Emanuel Urquhart & Sullivan, LLP representing Google LLC (“Google”) in this matter. If called as a witness, I could and would testify competently to the information contained herein.
2. Attached hereto as Exhibit 1 is a true and correct copy of a September 28, 2020 Email and attachment from Alaina Kwasizur to Bradley Riel and Tim Kowalski.
3. Attached hereto as Exhibit 2 is a true and correct copy of the Complaint for Declaratory Judgment filed in *Google LLC v. Sonos, Inc.*, No. 3-20-cv-06754 (N.D. Cal. Sep. 28, 2020).
4. Attached hereto as Exhibit 3 is a true and correct copy of Sonos’s Motion to Dismiss or Transfer to the Western District of Texas filed in *Google LLC v. Sonos, Inc.*, No. 3-20-cv-06754 (N.D. Cal. Sep. 28, 2020).
5. Attached hereto as Exhibit 4 is a true and correct copy of Google’s Opposition to Sonos’s Motion To Dismiss Or Transfer to the Western District of Texas filed in *Google LLC v. Sonos, Inc.*, No. 3-20-cv-06754 (N.D. Cal. Sep. 28, 2020).
6. Attached hereto as Exhibit 5 is a true and correct copy of Sonos’s Reply Brief in Support of Its Motion To Dismiss Or Transfer to the Western District of Texas filed in *Google LLC v. Sonos, Inc.*, No. 3-20-cv-06754 (N.D. Cal. Sep. 28, 2020).
7. Attached hereto as Exhibit 6 is a true and correct copy of the ECF notification for the docket entry associated with the Clerk’s Notice Resetting Motion Hearing and Initial Case Management Conference as entered in *Google LLC v. Sonos, Inc.*, No. 3-20-cv-06754 (N.D. Cal. Sep. 28, 2020).
8. Attached hereto as Exhibit 7 is a true and correct copy of a July 16, 2013 agreement between Google and Sonos.

9. Attached hereto as Exhibit 8 is a true and correct copy of a November 14, 2013 agreement between Google and Sonos.

10. Attached hereto as Exhibit 9 is a true and correct copy of the webpage <https://www.sonos.com/en-us/contact>.

11. Attached hereto as Exhibit 10 is a true and correct copy of the LinkedIn Profile of Robert Lambourne.

12. Attached hereto as Exhibit 11 is a true and correct copy of the Westlaw Public Records Report of Arthur Coburn IV.

13. Attached hereto as Exhibit 12 is a true and correct copy of the LinkedIn Profile of Joni Hoadley.

14. Attached hereto as Exhibit 13 is a true and correct copy of U.S. Patent No. 8,239,559.

15. Attached hereto as Exhibit 14 is a true and correct copy of the LinkedIn Profile of Ravi Rajapakse.

16. Attached hereto as Exhibit 15 is a true and correct copy of U.S. Patent Application Publication No. 2008/0120501 A1.

17. Attached hereto as Exhibit 16 is a true and correct copy of the LinkedIn Profile of Jan Jannink.

18. Attached hereto as Exhibit 17 is a true and correct copy of the LinkedIn Profile of Timothy E. McGraw.

19. Attached hereto as Exhibit 18 is a true and correct copy of U.S. Patent No. 7,720,686.

20. Attached hereto as Exhibit 19 is a true and correct copy of the webpage <https://www.pandora.com/static/careers/location-oak.html>.

21. Attached hereto as Exhibit 20 is a true and correct copy of the LinkedIn Profile of Andrew Volk.

22. Attached hereto as Exhibit 21 is a true and correct copy of the Westlaw Public Records Report of Erik Reed.

23. Attached hereto as Exhibit 22 is a true and correct copy of European Patent No. 2986034B1.

24. Attached hereto as Exhibit 23 is a true and correct copy of the webpage <https://www.dolby.com/about/support/dolby-offices-worldwide/#americas>.

25. Attached hereto as Exhibit 24 is a true and correct copy of the LinkedIn Profile of Alan Seefeldt.

26. Attached hereto as Exhibit 25 is a true and correct copy of the webpage <https://www.flightconnections.com/flights-to-waco-act>, which reflects the results of a search for direct flights to Waco, Texas.

27. Attached hereto as Exhibit 26 is a true and correct copy of the results of a search on <https://www.google.com/travel/flights> for flights between Santa Barbara, California and San Francisco, California.

28. Attached hereto as Exhibit 27 is a true and correct copy of the webpage <https://www.flightconnections.com/flights-from-boston-bos>, which reflects the results of searches for direct flights from Boston, Massachusetts to San Francisco, California.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on November 18, 2020, in San Francisco, California.

/s/ Lindsay Cooper  
Lindsay Cooper